

1 ALEX G. TSE (CABN 152348)  
2 Acting United States Attorney

3 BARBARA J. VALLIERE (DCBN 439353)  
4 Chief, Criminal Division

5 SAILAJA M. PAIDIPATY (NYBN 5160007)  
6 Assistant United States Attorney

7 450 Golden Gate Avenue, Box 36055  
8 San Francisco, California 94102-3495  
Telephone: (415) 436-6821  
FAX: (415) 436-7234  
sailaja.paidipaty@usdoj.gov

9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA, ) NO. CR 17-512 EMC  
14 Plaintiff, )  
15 v. )  
16 CLEVELAND MARTIN, ) **STIPULATION AND [PROPOSED] ORDER TO**  
17 Defendant. ) **CONTINUE HEARING FROM JUNE 13, 2018, TO**  
18 ) **JUNE 20, 2018, AND TO EXCLUDE TIME**  
19 ) **UNDER THE SPEED TRIAL ACT**

20 The parties appeared before the Court on May 16, 2018 for a status conference in the above-  
21 captioned case. The parties informed the Court that the government was in the process of obtaining  
22 additional discovery requested by the defendant. At the time, a further status was scheduled for June 13,  
23 2018, for motion setting with respect to an anticipated defense motion to suppress.

24 Since the last hearing, the parties have worked together both with respect to discovery as well as  
25 with respect to a potential disposition. The parties request a brief one-week continuance until June 20,  
26 2018, to allow for additional time for negotiations towards a pretrial resolution. Should the parties be  
27 unable to reach a joint resolution by June 20, 2018, they will be prepared to enter into a pretrial briefing  
28 schedule on that date.

STIPULATION AND PROPOSED ORDER  
CASE NO. CR 17-512 EMC

The parties agree and jointly request that the time between June 13, 2018, and June 20, 2018, should be excluded in order to provide reasonable time necessary for the continuity and effective preparation of counsel, pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv). The parties agree that the ends of justice are served by granting the continuance outweigh the best interests of the public and the defendant in a speedy trial.

SO STIPULATED:

ALEX G. TSE  
Acting United States Attorney

DATED: June 11, 2018

/s  
SAILAJA M. PAIDIPATY  
Assistant United States Attorney

DATED: June 11, 2018

/s  
CLEVELAND MARTIN  
Attorney for Steven Kalar

## **[PROPOSED] ORDER**

Based on the reasons provided in the stipulation of the parties above, the Court hereby FINDS that for adequate preparation of the case by all parties and continuity of counsel, and in the interest of justice, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), an exclusion of time is warranted under the Speedy Trial Act. Based on these findings, IT IS HEREBY ORDERED THAT the hearing is continued from June 13, 2018 until June 20, 2018 at 2:30 p.m., and time is excluded until June 20, 2018.

DATED: 6/12/18

